

REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested.

Currently, claims 1, 4-11, 14-20, 22, 25 and 32-37 are pending in this application.

Allowable Subject Matter:

Claims 9, 19 and 34-35 are allowable.

Rejection Under 35 U.S.C. §103:

Claims 1, 4-8, 10-11, 14-18, 20, 22 and 25 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over Houde et al (U.S. '678, hereinafter "Houde") in view of Alperovich et al (U.S. '673, hereinafter "Alperovich"). Applicant respectfully traverses this rejection.

In order to establish a *prima facie* case of obviousness, all of the claim limitations must be taught or suggested by the prior art. The combination of Houde and Alperovich fails to teach or suggest all of the claim limitations. For example, the combination fails to teach or suggest a home fixed telephone network and a visited fixed telephone network, as required by independent claims 1 and 11 and their respective dependents.

In marked contrast to a home fixed telephone network and a visited fixed telephone network, Houde explicitly states "The present invention relates to cellular telephone networks...(emphasis added)." (See col. 1, lines 18-19). While the claimed invention is directed to fixed telephone networks, Houde is directed to a cellular telephone network (a non-fixed telephone network). It should also now be clear that "fixed terminations" referred to in the claims are fixed telephones in a fixed telephone network such as a PSTN, and not mobile telephones in a mobile cellular network as described in Houde.

Houde thus relates to a mobile cellular-type communications network, in which a call originating from a user is identified with the billing record of the user using the user's subscriber identity and device-dependent identities for authentication purposes. In contrast, in a fixed telephone network, the calling line identity is generally used for generating billing records, and the specific user placing the call on the terminal associated with that line is irrelevant.

Like Houde, Alperovich relates to a mobile telecommunications network. Indeed, Alperovich's title states "Providing Location-Based Call Forwarding Within a Mobile Telecommunications Network (emphasis added)." Accordingly, even if Houde and Alperovich were combined as proposed by the Office Action, the combination would not have taught or suggested all of the claim limitations.

Page 4 of the Office Action admits that Houde fails to disclose "receiving a selection by the user of the fixed termination from a plurality of terminations located in the visited fixed telephone network," as required by independent claim 1. Similar comments apply to independent claim 11. Indeed, a user in Houde's system cannot select the routing of a call to a fixed termination of his/her choice. In Houde, the routing is limited to the mobile telephone that the user has taken with him/her to the foreign network.

Applicant submits that Alperovich fails to remedy this admitted deficiency of Houde. In particular, the Office Action alleges that col. 7, lines 3-41 and Fig. 6 of Alperovich discloses receiving a selection by the user of the fixed termination from a plurality of fixed terminations located in the visited fixed telephone network. Applicant respectfully disagrees. Col. 7, lines 3-41 states, *inter alia*, "FIG. 6 is a flowchart

illustrating the exemplary steps performed within a mobile telecommunications network for providing the location-based call forwarding feature of the present invention. As described above, whenever a mobile station travels into a new location area, the mobile station performs a location update with the serving MSC at step 400 and transmits its International Mobile Subscriber Identity (IMSI) number (emphasis added).” Alperovich thus fails to disclose a user selection of a fixed termination from among a plurality of fixed terminations located in the visited fixed telephone network.

Claim 1 further requires that a communication is initiated “with a visitor node from a fixed termination, wherein said visitor node and said fixed termination are located in the visited fixed telephone network.” Similar comments apply to independent claim 11. In exemplary embodiments of the present invention, a user can therefore pick up a telephone attached to the visited fixed network to initiate a communication and start a registration process.

The user is thus free to select a telephone number of a telephone that he/she wishes to have calls forwarded. This feature is specifically defined in claim 1 via “receiving a selection by the user of the fixed termination from a plurality of fixed terminations...” and “supplying the visitor node with the identity of the user-selected fixed termination...” as required by independent claim 1. The telephone to which calls are forwarded may be the same telephone as the one used to initiate the communication or may be any other telephone in the visited fixed telephone network. Registration of the user with the visited fixed telephone network continues with the visitor node registering itself as a proxy node (see the last step set forth in claim 1 stating “registering the visitor node as a proxy with the home node using the first identification number....”).

For example, this would enable someone's friend or family member to visit their home, and instead of that person being charged for the friend or family member's use of their phone, the friend or family member can register for their use of the phone to be provided with the bills for their use of their own "home phone". This also enables the visiting friend or family member to set up services such as "call forwarding", "call waiting", "ring back when free", "call screening" etc. which they have arranged to be available on their own home land line to be set up and available on the line they are using as a visitor.

In contrast, Houde relates to registering a mobile station in a foreign cellular network so that a call made to the home directory number of the roaming network can be routed to the foreign network and connected to the mobile terminal in the foreign network. When a user in Houde's system is in a foreign cellular network and does not have his/her mobile phone with them he/she is not able to get calls forwarded to him/her from his/her home network. Similar comments apply to Alperovich. (See, e.g., col. 7, lines 3-9 of Alperovich).

This problem is solved by exemplary embodiments of the present invention which enable the user to select a fixed termination from a plurality of fixed terminations located in a visited fixed telephone network. The user thus does not need to bring any terminal equipment to the region operated by the visited fixed telephone network (see, e.g., claims 22 and 25 now rewritten in independent form) to have calls successfully forwarded. The user supplies the details of the selected fixed termination from the plurality of possible fixed terminations of the visited fixed telephone network so that future calls can be routed by the home node to the user-selected fixed termination.

The Houde/Alperovich combination fails to even identify such a problem, let alone provide any solution to such a problem, as the teachings of Houde and Alperovich are fundamentally different to that of the present invention. Houde and Alperovich relate to cellular mobile networks where a user connects to a network using his/her own mobile terminal. This is in marked contrast to the exemplary embodiments of the present invention where the user has to identify a fixed termination from among a plurality of possible fixed terminations in a visited fixed telephone network such as a telephone in a PSTN for connection. There is no disclosure of a user selecting a fixed termination of the visited fixed telephone network to which calls can be routed. In Houde and Alperovich, a user must use the mobile terminal that he has taken with him/her from the home network to the foreign network, and as such does not require use of any fixed termination located in the visited fixed telephone network.

As suggested above, claims 22 and 25 relate to the user registering with a visited fixed telephone network without a need for any terminal equipment to be brought by the user to a region in which the visited fixed telephone network operates. The Office Action alleges that col. 4, lines 25-27 and 60-67 of Houde discloses this limitation. Applicant respectfully disagrees. Col. 4, lines 25-27 of Houde states "It would be preferred, however, if contact could be made with the subscriber instead by dialing the home directory number." Col. 4, lines 60-67 states "Responsive to receipt of the registration notification signal 104, a service profile 108 for the registering mobile station 16(1) is returned from the home location register 22 to the serving switching node 34 (for storage in its associated visitor location register). Once registered, the mobile station 16(1) may originate calls 110 to cellular or wire line subscribers either within the current country, or

to other countries.” As can be plainly seen, neither of these two portions of Houde (alone or considered in combination) discloses or suggests a user registering a visited fixed telephone network without a need for terminal equipment to be brought to the region in which the visited fixed telephone network operates.

Accordingly, Applicant respectfully requests that the rejection under 35 U.S.C. §103 in view of Houde and Alperovich be withdrawn.

Claims 32-33 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over the three-way combination of Houde, Alperovich and Syed et al (U.S. ‘451, hereinafter “Syed”). Since claims 32 and 33 respectively depend from claims 1 and 11, all of the comments made above in regards to the combination of Houde and Alperovich apply equally to these claims. Syed fails to remedy the above described deficiencies of this combination. Applicant thus respectfully requests that the rejection of claims 32-33 under 35 U.S.C. §103 be withdrawn.

New Claims:

New claims 36-37 have been added to provide additional protection for the invention. New independent claim 36 requires, *inter alia*, “initiating a communication with a visitor node from a terminal associated with a fixed line identity in said visited fixed network wherein said visitor node and said terminal are located in the visited fixed network; [and] receiving from the terminal a user-determined selection of one or more terminals, wherein each terminal is associated with a unique fixed line identity and is located in the visited fixed telephone network.” Applicant thus respectfully submits that claim 36 and 37 which depends therefrom are allowable.

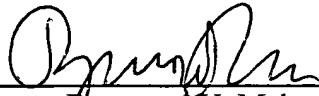
FENTON et al.
Application No. 09/936,178
August 4, 2006

Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect.

Respectfully submitted,

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